

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

Kristeena Scarpino, individually and on  
behalf of all Others similarly situated.  
*Plaintiff(s),*

v.

Imagination Industries, Inc., d/b/a American  
Dream and Casey Rowe,  
*Defendant(s).*

**COMES NOW** Defendant Imagination Industries, Inc., d/b/a American Dream, by and through his undersigned counsel, and moves this Court to grant leave of an extension of time for the filing of his Answer and Affirmative Defenses to Plaintiff's Amended Complaint. Defendant states:

1. This matter is before the Court on the Plaintiff's Amended Complaint filed on February 2, 2021 which supplanted or replaced its prior filed Complaint of October 26, 2020.
2. Defendants' Casey Rowe and American Dream respectively filed Motions to Dismiss the Amended Complaint on January 25, 2021.
3. The Magistrate Judge ruled on the Motions in its Findings and Recommendations to Hon. Judge Rossiter on March 19, 2021.
4. Hon. Judge Rossiter adopted and entered the Order on April 6, 2021.

5. Defendants have 14 days from the entry of the Order to file their Answer and Affirmative Defenses. FRCP Rule 12.
6. However, Defendants require additional time.
7. Defendants by co-counsel, Emeka Igbokwe, conferred with Plaintiffs' counsels Olena Savytska and Harold Lichten.
8. Both Plaintiffs' counsels do not object to extending the time for filing Defendants Answers and Affirmative Defenses for an additional 30 days.
9. As a result, Defendants move the court to grant additional time to each Defendant, Casey Rowe, and Defendant, American Dream, to file their Answers and Affirmative Defenses.

**WHEREFORE**, Defendants pray the Court grant an extension of time up to and including May 20, 2021, for both Defendants to file their Answers and Affirmative Defenses.

**DATED** this April 6, 2021

*Respectfully Submitted:*

Imagination Industries, Inc., d/b/a American Dream Defendant

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that this brief complies with the word limits set out in NE CivR. Rule 7.1(d)(1)(B) 429 words (i.e., not more than 3,500 words).

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of April 2021, a copy of the foregoing document was filed electronically through the Court's CM/ECF system, which will send notice of this filing to all counsel of record who are CM/ECF filers.

/s/ Emeka Igbokwe  
Emeka Igbokwe, Esq.